



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street  
San Francisco, CA 94105-3901

**OCT 29 2018**

Dr. Matt Miyasato, Deputy Executive Officer  
Science and Technology Advancement  
South Coast Air Quality Management District  
21865 Copley Drive  
Diamond Bar, California 91765-4178

Dear Dr. Miyasato:

Thank you for your submission of the South Coast Air Quality Management District (SCAQMD) *2018 Annual Air Quality Monitoring Network Plan* on June 28, 2018. We have reviewed the submitted document based on the requirements set forth in 40 CFR Part 58. Based on the information provided in the plan, the U.S. Environmental Protection Agency (EPA) approves all portions of the network plan except those specifically identified below. With this plan approval, we also formally approve an FEM waiver for the following sites, for the time periods specified in enclosure B to this letter: Anaheim (AQS ID: 06-059-0007-3), Central Los Angeles (AQS ID 06-037-1103-9), South Long Beach (AQS ID: 06-037-4004-3), Rubidoux (AQS ID: 06-065-8001-9), Mira Loma (AQS ID: 06-065-8005-3), Long Beach Route 710 (AQS ID: 06-037-4008), and Ontario Route 60 (AQS ID: 06-071-0027). Please include this waiver approval with next year's network plan.

Please note that we cannot approve portions of the annual network plan for which the information in the plan is insufficient to judge whether the requirement has been met, or for which the information provided does not meet the requirements as specified in 40 CFR 58.10 and the associated appendices. EPA Region 9 also cannot approve portions of the plan for which the EPA Administrator has not delegated approval authority to the regional offices. The first enclosure (A. *Annual Monitoring Network Plan Checklist*) is the checklist EPA used to review your plan for items that are required to be included in the annual network plan along with our assessment of whether the plan submitted by your agency addresses those requirements. Items highlighted in yellow are those EPA Region 9 is not acting on, as we either lack the authority to approve the specific item, or we have determined that a requirement is either not met or information in the plan is insufficient to judge whether the requirement has been met. Items highlighted in green in enclosure A require attention in order to improve next year's plan.

All comments conveyed via this letter and enclosures should be addressed prior to submittal of next year's annual monitoring network plan to EPA.

If you have any questions regarding this letter or the enclosed comments, please feel free to contact me at (415) 947-4134 or Jennifer Williams at (213) 244-1824.

Sincerely,

A handwritten signature in black ink, appearing to read 'Gwen Yoshimura', with a long horizontal flourish extending to the right.

Gwen Yoshimura, Manager  
Air Quality Analysis Office

Enclosures:

- A. Annual Monitoring Network Plan Checklist
- B. Approval of the SCAQMD Request for PM<sub>2.5</sub> FEM Waiver

cc (via email): Jason Low, SCAQMD

Andrea Polidori, SCAQMD

Rene Bermudez, SCAQMD

Jin Xu, California Air Resources Board (CARB)

Kathy Gill, CARB

Michael Miguel, CARB

Michael Werst, CARB

Sylvia Vanderspek, CARB

Webster Tasat, CARB

## A. ANNUAL MONITORING NETWORK PLAN CHECKLIST

(Updated July 10, 2018)

Year: 2018

Agency: South Coast Air Quality Management District

40 CFR 58.10(a)(1) requires that each Annual Network Plan (ANP) shall provide for the documentation of the establishment and maintenance of an air quality surveillance system that consists of a network of SLAMS monitoring stations that can include FRM, FEM, and ARM monitors that are part of SLAMS, NCore, CSN, PAMS, and SPM stations.

40 CFR 58.10(a)(1) further directs that, "The plan shall include a statement of whether the operation of each monitor meets the requirements of appendices A, B, C, D, and E of this part, where applicable. The Regional Administrator may require additional information in support of this statement." On this basis, review of the ANPs is based on the requirements listed in 58.10 along with those in Appendices A, C, D, and E.

EPA Region 9 will not take action to approve or disapprove any item for which Part 58 grants approval authority to the Administrator rather than the Regional Administrators, but we will do a check to see if the required information is included and correct. The items requiring approval by the Administrator are: NCore, and Speciation (STN/CSN).

Please note that this checklist summarizes many of the requirements of 40 CFR Part 58, but does not substitute for those requirements, nor do its contents provide a binding determination of compliance with those requirements. The checklist is subject to revision in the future and we welcome comments on its contents and structure.

Key:

White	meets the requirement
Yellow	requirement is not met, or information is insufficient to make a determination. Action requested in next year's plan or outside the ANP process.
Green	item requires attention in order to improve next year's plan.

	ANP requirement	Citation within 40 CFR 58 <sup>1</sup>	Was the information submitted? <sup>2</sup> If yes, section or page #s.	Does the information provided <sup>3</sup> meet the requirement? <sup>4</sup>	Notes
<b>GENERAL PLAN REQUIREMENTS</b>					
1.	Submit plan by July 1 <sup>st</sup>	58.10 (a)(1)	Yes	Yes	Plan Submitted on June 28, 2018.
2.	30-day public comment / inspection period	58.10 (a)(1); 58.10 (c)	Yes Page 2	Yes	
3.	Statement of whether the operation of each monitor meets the requirements of appendices A, B, C, D, and E, where applicable	58.10 (a)(1)	Yes, Page 2	Yes	
4.	Modifications to SLAMS network – case when we are not approving system modifications	58.10 (a)(2); 58.10 (b)(5); 58.10 (e); 58.14	Yes Page 24-25	Insufficient to Judge	Several closure and relocations are noted and require additional information.
5.	Modifications to SLAMS network – case when we are approving system modifications per 58.14	58.10 (a)(2); 58.10 (b)(5); 58.10 (e); 58.14	N/A	N/A	
6.	Does plan include documentation (e.g., attached approval letter) for system modifications that have been approved since last ANP approval?		N/A	N/A	
7.	Any proposals to remove or move a monitoring station within a period of 18 months following plan submittal	58.10 (b)(5)	Yes Page 24-25	Yes	
8.	Precision/Accuracy reports submitted to AQS	58.16 (a)	Yes Page 33	Yes	
9.	Annual data certification submitted	58.15	Yes Page 33	Yes	
10.	Statement that SPMs operating an FRM/FEM/ARM that meet Appendix E also meet either Appendix A or an approved alternative. Documentation for any Appendix A approved alternative should be included. <sup>5</sup>	58.11 (a)(2)	N/A	N/A	

<sup>1</sup> Unless otherwise noted.

<sup>2</sup> Response options: NA (Not Applicable), Yes, No, or Incomplete.

<sup>3</sup> Assuming the information is correct.

<sup>4</sup> Response options: NA (Not Applicable) – [reason], Yes, No, Insufficient to Judge, or Incorrect

<sup>5</sup> Alternatives to the requirements of appendix A may be approved for an SPM site as part of the approval of the annual monitoring plan, or separately.

	<b>ANP requirement</b>	<b>Citation within 40 CFR 58<sup>1</sup></b>	<b>Was the information submitted?<sup>2</sup> If yes, section or page #s.</b>	<b>Does the information provided<sup>3</sup> meet the requirement?<sup>4</sup></b>	<b>Notes</b>
11.	SPMs operating FRM/FEM/ARM monitors for over 24 months are listed as comparable to the NAAQS or the agency provided documentation that requirements from Appendices A, C, or E were not met. <sup>6</sup>	58.20 (c)	N/A	N/A	
12.	For agencies that share monitoring responsibilities in an MSA/CSA: this agency meets full monitoring requirements or an agreement between the affected agencies and the EPA Regional Administrator is in place	App D 2(e)	N/A	N/A	

#### **GENERAL PARTICULATE MONITORING REQUIREMENTS (PM<sub>10</sub>, PM<sub>2.5</sub>, Pb-TSP, Pb-PM<sub>10</sub>)**

13.	Designation of a primary monitor if there is more than one monitor for a pollutant at a site.	App. A 3.2.3	Yes Detailed Site Report	Incorrect in some instances	Fontana – Arrow Highway lists two primary PM <sub>2.5</sub> monitors. Based on other information in the table it is likely PM <sub>2.5</sub> POC 11 is incorrectly listed as “primary” and is a speciated PM <sub>2.5</sub> method.  Los Angeles – North Main Street lists one QA collocated Pb monitor and one as “N/A”.
14.	Distance between QA collocated monitors. For low volume PM instruments (flow rate < 200 liters/minute) > 1 m. For high volume PM instruments (flow rate > 200 liters/minute) > 2m. [Note: waiver request or the date of previous waiver approval must be included if the distance deviates from requirement.]	App. A 3.2.3.4 (c) and 3.3.4.2 (c)	Yes Detailed Site Report	Yes	

#### **PM<sub>2.5</sub> –SPECIFIC MONITORING REQUIREMENTS**

15.	Document how states and local agencies provide for the review of changes to a PM <sub>2.5</sub> monitoring network that impact the location of a violating PM <sub>2.5</sub> monitor.	58.10 (c)	Yes Page 18	Yes	
16.	Identification of any PM <sub>2.5</sub> FEMs and/or ARMs not eligible to be compared to the NAAQS due to poor comparability to FRM(s) [Note 1: must include required data assessment.] [Note 2: Required	58.10 (b)(13) 58.11 (e)	Yes Appendix C	Yes	

<sup>6</sup> This requirement only applies to monitors that are eligible for comparison to the NAAQS per 40 CFR §§58.11(e) and 58.30.

	<b>ANP requirement</b>	<b>Citation within 40 CFR 58<sup>1</sup></b>	<b>Was the information submitted?<sup>2</sup> If yes, section or page #s.</b>	<b>Does the information provided<sup>3</sup> meet the requirement?<sup>4</sup></b>	<b>Notes</b>
	SLAMS must monitor PM <sub>2.5</sub> with <u>NAAQS-comparable</u> monitor at the required sample frequency.]				
17.	Minimum # of monitoring <b>sites</b> for PM <sub>2.5</sub> [Note 1: should be supported by MSA ID, MSA population, DV, # monitoring sites, and # required monitoring sites] [Note 2: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.]	App. D 4.7.1(a) and Table D-5	Yes Page 27-28	Yes	
18.	Requirements for continuous PM <sub>2.5</sub> monitoring (number of monitors and collocation)	App. D 4.7.2	Yes Page 27-28	Yes	
19.	FRM/FEM/ARM PM <sub>2.5</sub> QA collocation	App. A 3.2.3	Yes Page 32	Yes	
20.	PM <sub>2.5</sub> Chemical Speciation requirements for official STN sites	App. D 4.7.4	N/A	N/A	
21.	Identification of sites suitable and sites not suitable for comparison to the annual PM <sub>2.5</sub> NAAQS as described in Part 58.30	58.10 (b)(7)	N/A	N/A	
22.	Required PM <sub>2.5</sub> sites represent area-wide air quality	App. D 4.7.1(b)	Yes Page 6 Detailed Site Report	Yes	
23.	For PM <sub>2.5</sub> , within each MSA, at least one site at neighborhood or larger scale in an area of expected maximum concentration	App. D 4.7.1(b)(1)	Yes Page 6 Detailed Site Report	Yes	
24.	If additional SLAMS PM <sub>2.5</sub> is required, there is a site in an area of poor air quality	App. D 4.7.1(b)(3)	Yes Pages 17-18	Yes	
25.	States must have at least one PM <sub>2.5</sub> regional background and one PM <sub>2.5</sub> regional transport site.	App. D 4.7.3	N/A	N/A	
26.	Sampling schedule for PM <sub>2.5</sub> - applies to year-round and seasonal sampling schedules (note: date of waiver approval must be included if the sampling season deviates from requirement)	58.10 (b)(4); 58.12(d); App. D 4.7	Yes Page 2	Yes	The plan states that Big Bear was granted an exception at the inception of the program to operate a frequency of 1 in 6 days. Please provide the documentation that this sampling schedule was approved in next year's plan.
27.	Frequency of flow rate verification for automated and manual PM <sub>2.5</sub> monitors	App. A 3.2.1	Yes Detailed Site Tables	Yes	

	ANP requirement	Citation within 40 CFR 58 <sup>1</sup>	Was the information submitted? <sup>2</sup> If yes, section or page #s.	Does the information provided <sup>3</sup> meet the requirement? <sup>4</sup>	Notes
28.	Dates of two semi-annual flow rate audits conducted in <b>CY2017</b> for PM <sub>2.5</sub> monitors [Note: 5 - 7 month interval is recommended but not a requirement.]	App. A 3.2.2	Yes Detailed Site Tables	Yes	Riverside Rubidoux semi-annual flow rate row has double printing, making it difficult to read the text.

#### PM<sub>10</sub> –SPECIFIC MONITORING REQUIREMENTS

29.	Minimum # of monitoring sites for PM <sub>10</sub> [Note: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.]	App. D, 4.6 (a) and Table D-4	Yes Page 29	Yes	
30.	Manual PM <sub>10</sub> method collocation (note: continuous PM <sub>10</sub> does not have this requirement)	App. A 3.3.4	Yes Page 32	Yes	<p>The text on page 10 states – “[w]here both 24-hour PM<sub>10</sub> FRM samplers and PM<sub>10</sub> FEM continuous analyzers are deployed together, they are sited as collocated for data comparison purposes where possible. FRM PM<sub>10</sub> sampler remains the primary analyzer used for attainment purposes and continuous analyzers are designated as audit samplers unless the primary 24-hour FRM PM<sub>10</sub> is offline then the continuous FEM analyzer data can be substituted.”</p> <p>Manual samplers can only be QA collocated with another manual sampler. If a continuous FEM is present at a site with a manual FRM, both data streams are comparable to the NAAQS independent of one another.</p>
31.	Sampling schedule for PM <sub>10</sub>	58.10 (b)(4); 58.12(e); App. D 4.6	Yes Page 12	Insufficient to Judge	Sampling frequency requirements are not separated by FRM and FEM. In next year’s plan, please include all PM <sub>10</sub> SLAMS in Table 6.
32.	Frequency of flow rate verification for automated and manual PM <sub>10</sub> monitors	App. A 3.3.1 and 3.3.2	Yes Detailed Site Tables	Yes	
33.	Dates of two semi-annual flow rate audits conducted in <b>CY2017</b> for PM <sub>10</sub> monitors [Note: 5 -7 month interval is recommended but not	App. A 3.3.3	Yes Detailed Site Tables	Yes	Anaheim – Loara School incorrectly lists a date of “11/047/2017.”

	ANP requirement	Citation within 40 CFR 58 <sup>1</sup>	Was the information submitted? <sup>2</sup> If yes, section or page #s.	Does the information provided <sup>3</sup> meet the requirement? <sup>4</sup>	Notes
	a requirement.]				

#### Pb –SPECIFIC MONITORING REQUIREMENTS

34.	Minimum # of monitors for non-NCore Pb [Note: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.]	App D 4.5	Yes Page 32	Yes	
35.	Pb collocation: for non-NCore sites	App A 3.4.4 and 3.4.5	Yes Page 32	Yes	
36.	Any source-oriented Pb site for which a waiver has been granted by EPA Regional Administrator	58.10 (b)(10)	N/A	N/A	
37.	Any Pb monitor for which a waiver has been requested or granted by EPA Regional Administrator for use of Pb-PM <sub>10</sub> in lieu of Pb-TSP	58.10 (b)(11)	N/A	N/A	
38.	Designation of any Pb monitors as either source-oriented or non-source-oriented	58.10 (b)(9)	Yes Page 15	Yes	
39.	Sampling schedule for Pb	58.10 (b)(4); 58.12(b); App A 3.4.4.2 (c) and 3.4.5.3 (c)	Yes Page 15	Yes	
40.	Frequency of flow rate verification for Pb monitors audit	App A 3.4.1 and 3.4.2	Yes Detailed Sites Tables	Yes	
41.	Dates of two semi-annual flow rate audits conducted in <b>CY2017</b> for Pb monitors [Note: 5 -7 month interval is recommended but not a requirement.]	App A 3.4.3	Yes Detailed Sites Tables	Yes	

#### GENERAL GASEOUS MONITORING REQUIREMENTS

42.	Frequency of one-point QC check (gaseous)	App. A 3.1.1	Yes Detailed Site Tables	Yes	
43.	Date of Annual Performance Evaluation (gaseous) conducted in <b>CY2017</b>	App. A 3.1.2	Yes Detailed Site Tables	Yes	Mission Viejo CO and O <sub>3</sub> incorrectly list semi-annual flow rate audits for a PM monitor dated 03/29/2017.

	<b>ANP requirement</b>	<b>Citation within 40 CFR 58<sup>1</sup></b>	<b>Was the information submitted?<sup>2</sup> If yes, section or page #s.</b>	<b>Does the information provided<sup>3</sup> meet the requirement?<sup>4</sup></b>	<b>Notes</b>
					Ontario Route 60 Near Road NO <sub>2</sub> incorrectly lists semi-annual flow rate audits for a PM monitor dated 11/16/2017.

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44.	Minimum # of monitoring sites for O <sub>3</sub> [Note 1: should be supported by MSA ID, MSA population, DV, # monitoring sites, and # required monitoring sites] [Note 2: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.] [Note 3: monitors that do not meet traffic count/distance requirements to be neighborhood or urban scale (40 CFR Appendix E, Table E-1) cannot be counted towards meeting minimum monitoring requirements]	App D 4.1(a) and Table D-2	Yes Page 27	Yes	
45.	Identification of maximum concentration O <sub>3</sub> site(s)	App D 4.1 (b)	Yes Detailed Site Tables	Yes	
46.	Sampling season for O <sub>3</sub> (Note: Waivers must be renewed annually. EPA expects agencies to submit re-evaluations of the relevant data each year with the ANP. EPA will then respond as part of the ANP response.)	58.10 (b)(4); App D 4.1(i)	Yes Detailed Site Tables	Yes	
47.	A plan for making Photochemical Assessment Monitoring Stations (PAMS) measurements, if applicable. The plan shall provide for the required PAMS measurements to begin by June 1, 2019.	58.10 (a)(10)	Yes Appendix D	Yes	

<b>NO<sub>2</sub> –SPECIFIC MONITORING REQUIREMENTS</b>
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48.	Minimum monitoring requirements for area-wide NO <sub>2</sub> monitor in location of expected highest NO <sub>2</sub> concentrations representing neighborhood or larger scale (operation required by 1/1/13)	App D 4.3.3	Yes Page 29	Yes	
49.	Minimum monitoring requirements for susceptible and vulnerable populations monitoring (aka RA40) NO <sub>2</sub> (operation required by January 1, 2013)	App D 4.3.4	Yes Page 29	Yes	
50.	Identification of required NO <sub>2</sub> monitors as either	58.10 (b)(12)	Yes	Yes	

	<b>ANP requirement</b>	<b>Citation within 40 CFR 58<sup>1</sup></b>	<b>Was the information submitted?<sup>2</sup> If yes, section or page #s.</b>	<b>Does the information provided<sup>3</sup> meet the requirement?<sup>4</sup></b>	<b>Notes</b>
	near-road, area-wide, or vulnerable and susceptible population (aka RA40)		Page 22		

#### NEAR ROADWAY – SPECIFIC MONITORING REQUIREMENTS

In CBSAs  $\geq 2.5$  million, the following near-roadway minimum monitoring requirements apply:

51.	Two NO <sub>2</sub> monitors	App. D 4.3.2(a); 58.13(c)(3) and (4)	Yes Page 29	Yes	
52.	One CO monitor	App. D 4.2.1(a); 58.13(e)(2)	Yes Page 30	Yes	
53.	One PM <sub>2.5</sub> monitor	App. D 4.7.1(b)(2); 58.13(f)(2)	Yes Page 28	Yes	

In CBSAs  $\geq 1$  million and AADT  $\geq 250K$ , the following near-roadway minimum monitoring requirements apply:

54.	Two NO <sub>2</sub> monitors	App. D 4.3.2(a); 58.13(c)(3) and (4)	N/A	N/A	
55.	One CO monitor (by 1/1/2017)	App. D 4.2.1(a); 58.13(e)(2)	N/A	N/A	
56.	One PM <sub>2.5</sub> monitor (by 1/1/2017)	App. D 4.7.1(b)(2); 58.13(f)(2)	N/A	N/A	

In CBSAs  $\geq 1$  million and  $\leq 2.5$  million **AND** AADT  $< 250K$ , the following near-roadway minimum monitoring requirements apply:

57.	One NO <sub>2</sub> monitors	App. D 4.3.2(a); 58.13(c)(3)	N/A	N/A	
58.	One CO monitor (by 1/1/2017)	App. D 4.2.1(a); 58.13(e)(2)	N/A	N/A	
59.	One PM <sub>2.5</sub> monitor (by 1/1/2017)	App. D 4.7.1(b)(2); 58.13(f)(2)	N/A	N/A	

#### SO<sub>2</sub> –SPECIFIC MONITORING REQUIREMENTS

	<b>ANP requirement</b>	<b>Citation within 40 CFR 58<sup>1</sup></b>	<b>Was the information submitted?<sup>2</sup> If yes, section or page #s.</b>	<b>Does the information provided<sup>3</sup> meet the requirement?<sup>4</sup></b>	<b>Notes</b>
60.	Minimum monitoring requirements for SO <sub>2</sub> based on PWEI and/or RA required monitors under Appendix D 4.4.3 [Note: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.]	App D 4.4	Yes Page 13-14 Figure 5	Yes	
61.	Monitors used to meet Data Requirements Rule (operational no later than January 1, 2017.)	51.1203(c)	N/A	N/A	

#### NCORE –SPECIFIC MONITORING REQUIREMENTS

62.	NCore site and all required parameters operational: year-round O <sub>3</sub> , SO <sub>2</sub> , CO, NO <sub>y</sub> , NO, PM <sub>2.5</sub> mass, PM <sub>2.5</sub> continuous, PM <sub>2.5</sub> speciation, PM <sub>10-2.5</sub> mass, resultant wind speed at 10m, resultant wind direction at 10m, ambient temperature, relative humidity. NO <sub>y</sub> waiver, if applicable.	App. D 3(b)	Yes Detailed Site Reports	Yes	
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#### SITE OR MONITOR - SPECIFIC REQUIREMENTS (OFTEN INCLUDED IN DETAILED SITE INFORMATION TABLES)

63.	AQS site identification number for each site	58.10 (b)(1)	Yes Detailed Site Reports	Yes	AQS ID is listed as “unavailable” SA Recycling in the “Detailed Site Information” table but is provided in the overview on the prior page.
64.	Location of each site: street address and geographic coordinates	58.10 (b)(2)	Yes Detailed Site Reports	Yes	
65.	MSA, CBSA, CSA or other area represented by the monitor	58.10 (b)(8)	Yes Detailed Site Reports	Yes	
66.	Parameter occurrence code for each monitor	Needed to determine if other requirements (e.g., min # and collocation) are met	Yes Detailed Site Reports	Yes	
67.	Basic monitoring objective for each monitor	App D 1.1; 58.10 (b)(6)	Yes Detailed Site	Yes	

	ANP requirement	Citation within 40 CFR 58 <sup>1</sup>	Was the information submitted? <sup>2</sup> If yes, section or page #s.	Does the information provided <sup>3</sup> meet the requirement? <sup>4</sup>	Notes
			Reports		
68.	Site type for each monitor	App D 1.1.1	Yes Detailed Site Reports	Yes	
69.	Monitor type for each monitor, and Network Affiliation(s) as appropriate	Needed to determine if other requirements (e.g., min # and collocation) are met	Yes Detailed Site Reports	Incorrect in some instances	<p>The following sites list a monitor type or network affiliation that is not one of the acceptable options:</p> <ul style="list-style-type: none"> <li>Anaheim Near Road (monitor type) CO - Near Road</li> <li>AT&amp;SF (network affiliation) Pb - Microscale Pb</li> <li>Azusa (network affiliation) metals, carbonyls, VOCs - CA Air Toxics</li> <li>Closet World Quemetco (network affiliation) Pb - Microscale Pb</li> <li>Compton (monitor type) Pb - SQA Collocated</li> <li>Indio (monitor type) PM<sub>10</sub> - /QA Collocated"</li> <li>710 Near Road (monitor type) NO<sub>2</sub>, PM<sub>2.5</sub>, CO - Near Road</li> <li>LA North Main Street (monitor type) Various pollutants – Ncore/NATTS/QA Collocated/Pb</li> <li>LA North Main Street (network affiliation) various pollutants – QA Collocated/Pb/CA Air Toxics</li> <li>Mira Loma (monitor type) PM<sub>2.5</sub> – QA Collocated</li> <li>Rehrig (network affiliation) Pb – Microscale Pb</li> <li>Roverside – Rubidoux (network affiliation) Various pollutants – CA Air Toxics</li> <li>SA Recycling (network affiliation) Pb – Microscale Pb</li> <li>Uddeholm (network affiliation) Pb – Microscale Pb</li> </ul>
70.	Scale of representativeness for each monitor as	58.10(b)(6);	Yes	Yes	

	<b>ANP requirement</b>	<b>Citation within 40 CFR 58<sup>1</sup></b>	<b>Was the information submitted?<sup>2</sup> If yes, section or page #s.</b>	<b>Does the information provided<sup>3</sup> meet the requirement?<sup>4</sup></b>	<b>Notes</b>
	defined in Appendix D	App D	Detailed Site Reports		
71.	Parameter code for each monitor	Needed to determine if other requirements (e.g., min # and collocation) are met	Yes Detailed Site Reports	Insufficient to judge	Parameter Code information is missing for the following sites: <ul style="list-style-type: none"> <li>• All pollutants (except PM<sub>2.5</sub>) at Lake Elsinore.</li> <li>• Pb, PM<sub>10</sub> at LAX - Hastings</li> </ul>
72.	Method code and description (e.g., manufacturer & model) for each monitor	58.10 (b)(3); App C 2.4.1.2	Yes Detailed Site Reports	Incorrect in some instances	Method code 780 does not exist for PM <sub>2.5</sub> : <ul style="list-style-type: none"> <li>• Anaheim-Loara School</li> <li>• Big Bear</li> <li>• Compton</li> <li>• Fontana Arrow Highway</li> <li>• Indio Jackson</li> <li>• South Long Beach</li> <li>• Mission Viejo</li> <li>• Palm Springs – Fire Station</li> <li>• Pico Rivera</li> <li>• Reseda</li> </ul>
73.	Sampling start date for each monitor	Needed to determine if other requirements (e.g., min # and collocation) are met	Yes Detailed Site Reports	Yes	Long Beach (Hudson) start date is listed as “1/10”. Unclear if this is mean as January 2010 or if the year is missing since the convention is listed as “MM/DD/YYYY”.
74.	Distance of monitor from nearest road	App E 6	Yes Detailed Site Reports		
75.	Traffic count of nearest road	App E	Yes Detailed Site Reports		

	<b>ANP requirement</b>	<b>Citation within 40 CFR 58<sup>1</sup></b>	<b>Was the information submitted?<sup>2</sup> If yes, section or page #s.</b>	<b>Does the information provided<sup>3</sup> meet the requirement?<sup>4</sup></b>	<b>Notes</b>
76.	Groundcover	App E 3(a)	Yes Site Survey Report	Yes	
77.	Probe height	App E 2	Yes Detailed Site Reports	Yes	Reseda PM <sub>2.5</sub> (continuous) probe height is 1.5 meters. Since this monitor has the waiver, it is not required, but suggest elevating to at least 2m to better compare with the manual FRM.
78.	Distance from supporting structure (vertical and horizontal, if applicable, should be provided)	App E 2	Yes Detailed Site Reports	Not meeting requirement in some instances	The following PM <sub>2.5</sub> monitors are not at least 1.8m (2m +/- .02m) from the supporting structure: <ul style="list-style-type: none"> <li>• Riverside- Rubidoux – PM<sub>2.5</sub> - 1.6m</li> <li>• San Bernardino PM<sub>2.5</sub> - 1m</li> <li>• Temecula PM<sub>2.5</sub> – 1m</li> <li>• Upland PM<sub>2.5</sub> – 1.7m</li> </ul> Reseda – Distance to supporting structure (2m) is more than probe height (1.5).
79.	Distance from obstructions on roof (horizontal distance to the obstruction and vertical height of the obstruction above the probe should be provided)	App E 4(b)	Yes Detailed Site Reports	Yes	
80.	Distance from obstructions not on roof (horizontal distance to the obstruction and vertical height of the obstruction above the probe should be provided)	App E 4(a)	Yes Detailed Site Reports	Yes	
81.	Distance from the drip line of closest tree(s)	App E 5	Yes Detailed Site Reports	Not meeting requirement in one instance	Pasadena – 6m to tree
82.	Distance to furnace or incinerator flue	App E 3(b)	Yes Detailed Site Reports	Insufficient to judge	Pico Rivera – 4m to flue. No discussion is in predominant wind direction
83.	Unrestricted airflow (expressed as degrees around probe/inlet or percentage of monitoring path)	App E, 4(a) and 4(b)	Yes Detailed Site Reports	Insufficient to judge	Crestline – 225 degrees of unobstructed airflow
84.	Probe material (NO/NO <sub>2</sub> /NO <sub>y</sub> , SO <sub>2</sub> , O <sub>3</sub> ; For PAMS: VOCs, Carbonyls)	App E 9	Yes Detailed Site Reports	Yes	

	<b>ANP requirement</b>	<b>Citation within 40 CFR 58<sup>1</sup></b>	<b>Was the information submitted?<sup>2</sup> If yes, section or page #s.</b>	<b>Does the information provided<sup>3</sup> meet the requirement?<sup>4</sup></b>	<b>Notes</b>
85.	Residence time (NO/NO <sub>2</sub> /NO <sub>y</sub> , SO <sub>2</sub> , O <sub>3</sub> ; For PAMS: VOCs, Carbonyls)	App E 9	Yes Detailed Site Reports	Yes	

## Public Comments on Annual Network Plan

Were comments submitted to the S/L/T agency during the public comment period?	<b>No</b>
Were comments included in ANP submittal?	<b>N/A</b>
Were any of the comments substantive? If yes, which ones? If comments were not substantive provide rationale.	<b>N/A</b>
Were S/L/T responses to substantive comments included in ANP submittal?	<b>N/A</b>
Were the S/L/T responses to substantive comments adequate?	<b>N/A</b>
Do the substantive comments require separate EPA response (i.e., agency response wasn't adequate)?	<b>N/A</b>
Are the sections of the annual network plan that received substantive comments approvable after consideration of comments? If yes, provide rationale	<b>N/A</b>

## B. Approval of the SCAQMD Request for PM<sub>2.5</sub> FEM Waiver

In the South Coast Air Quality Management District (SCAQMD) *2018 Annual Air Quality Monitoring Network Plan*, submitted June 28, 2018, SCAQMD requested EPA's approval to consider the 2015-2017 PM<sub>2.5</sub> data from the continuous federal equivalent method (FEM) monitors at the following sites as not eligible for comparison to the NAAQS: Anaheim (AQS ID: 06-059-0007-3), Central Los Angeles (AQS ID 06-037-1103-9), South Long Beach (AQS ID: 06-037-4004-3), Rubidoux (AQS ID: 06-065-8001-9), Mira Loma (AQS ID: 06-065-8005-3), Long Beach Route 710 (AQS ID: 06-037-4008-3), and Ontario Route 60 (AQS ID: 06-071-0027-3). This enclosure approves the monitors listed below for the specified dates as not eligible for comparison to the NAAQS (i.e., provides a waiver for NAAQS comparability).

According to 40 CFR 58.11(e), in order to be considered not eligible for comparison to the NAAQS, continuous FEM PM<sub>2.5</sub> data must be shown to not meet the criteria in 40 CFR 53 Table C-4. These criteria describe the maximum allowable multiplicative and additive bias between filter-based federal reference method (FRM) PM<sub>2.5</sub> monitor and a Class III continuous FEM PM<sub>2.5</sub> monitor operating at the same site. EPA based its evaluation on the criteria in 40 CFR 53 as described by our memo dated April 20, 2013 and its attached document titled, "Instructions and Template for Requesting that data from PM<sub>2.5</sub> Continuous FEMs are not compared to the NAAQS."

We reviewed your request for 2015-2017 data and have determined that the following monitors do not meet the bias criteria in 40 CFR 53 (see the attached "EPA Evaluation for the Request for Exclusion of PM<sub>2.5</sub> Continuous FEM Data" table) and are approved as not eligible for comparison to the NAAQS for the noted time periods:

Site Name	AQS ID-Parameter Code-POC	Begin Date	End Date
Anaheim	06-059-0007-3	01/01/2015	12/31/2017
Central Los Angeles	06-037-1103-9	01/01/2015	12/31/2017
South Long Beach	06-037-4004-3	01/03/2015	12/31/2017
Rubidoux	06-065-8001-9	01/01/2015	12/31/2017
Mira Loma	06-065-8005-3	01/01/2015	12/31/2017
Long Beach Route 710	06-037-4008-3	01/01/2016	12/31/2017
Ontario Route 60	06-071-0027-3	08/01/2015	12/31/2017

Your request stated that you consider the continuous PM<sub>2.5</sub> data of sufficient quality to report to the AQI, and will be submitting the data to AIRNow. As such, it is appropriate to submit the data from the monitors and dates in the table above to AQS under the parameter code 88502.

In providing the waiver for the data in the timeframes listed above, EPA expects that SCAQMD will continue to work to improve the comparability of the continuous PM<sub>2.5</sub> FEM monitors and their filter-based monitors. If SCAQMD intends to submit data from these monitors under a parameter code other than 88101, an updated analysis of the bias for each FEM monitor should be included in future annual network plans for a renewed waiver approval.

In addition, since the intent of such a waiver is to allow more time for method and operational

improvements to meet the required bias, SCAQMD must develop a performance assessment and improvement plan to be approved by EPA that describes how the agency will track the performance of these monitors on a quarterly or more frequent basis, as well as the activities SCAQMD intends to take to address any continuing performance issues.

## EPA Evaluation of the Request for Exclusion of PM<sub>2.5</sub> Continuous FEM Data

2015-2017

Site Name	Site ID	Cont POC	Method Description	PM <sub>2.5</sub> Cont. Analysis Begin Date	PM <sub>2.5</sub> Cont Analysis End Date	Continuous/ FRM Sampler pairs per season	Slope (m)	Intercept (y)	Meets bias requirement	Correlation (r)
<i>Sites with PM<sub>2.5</sub> continuous FEMs that are collocated with FRMs:</i>										
Anaheim*	06-059-0007	3	Met-One BAM 1020 w/VSCC	01/01/2015	12/31/2017	Winter = 218 Spring = 266 Summer = 260 Fall = 178 Total = 922	1.09	2.77	No	0.93
Central Los Angeles*	06-037-1103	9	Met-One BAM 1020 w/VSCC	01/01/2015	12/31/2017	Winter = 222 Spring = 249 Summer = 248 Fall = 237 Total = 956	1.19	1.96	No	0.95
South Long Beach	06-037-4004	3	Met-One BAM 1020 w/VSCC	01/03/2015	12/31/2017	Winter = 242 Spring = 252 Summer = 258 Fall = 256 Total = 1008	1.14	1.50	No	0.94
Rubidoux*	06-065-8001	9	Met-One BAM 1020 w/VSCC	01/01/2015	12/31/2017	Winter = 243 Spring = 261 Summer = 261 Fall = 262 Total = 1027	1.01	2.13	No	0.92
Mira Loma*	06-065-8005	3	Met-One BAM 1020 w/VSCC	01/01/2015	12/31/2017	Winter = 236 Spring = 235 Summer = 243 Fall = 236 Total = 950	0.98	3.79	No	0.90
Long Beach Route 710	06-037-4008	3	Thermo BAM 5014i w/VSCC	01/01/2016	12/31/2017	Winter = 167 Spring = 156 Summer = 180 Fall = 171 Total = 674	0.96	2.80	No	0.92
Ontario Route 60	06-071-0027	3	Thermo BAM 5014i w/VSCC	08/01/2015	12/31/2017	Winter = 180 Spring = 164 Summer = 197 Fall = 230 Total = 771	0.90	3.52	No	0.88

\*The number of FRM/sampler pairs, slope, intercept, and/or correlation (r) differ slightly between this table and SCAQMD's request for some monitors, due to changes in the EPA PM<sub>2.5</sub> Continuous Monitor Comparability Tool that were made between the preparation of SCAQMD's request and EPA's evaluation of the request. However, all of the listed monitors continue to not meet the bias requirement when evaluated with the new tool.